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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re

**THE LITIGATION PRACTICE
GROUP P.C.,**

Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

**NOTICE OF MOTION AND MOTION
TO FILE EXHIBIT "1" TO THE
DECLARATION OF CHRISTOPHER
GHIO IN SUPPORT MOTION FOR
ENTRY OF ORDER ENFORCING
AGREEMENT OF PURCHASE AND
SALE AND JOINT ESCROW
INSTRUCTION, AND COMPELLING
MORNING LAW GROUP, P.C. TO
MAKE PAYMENT THEREUNDER AND
RELATED RELIEF UNDER SEAL**

Date: *[No Hearing Required]*

Time: *[No Hearing Required]*

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, CA 92701

1 **PLEASE TAKE NOTICE** that on April 2, 2025, Richard A. Marshack, Liquidating
2 Trustee (the “Trustee”) of the LPG Liquidating Trust (the “Trust”), as representative of the
3 successor-in-interest to the bankruptcy estate of the Litigation Practice Group, P.C. (the “Debtor”) in the above-referenced bankruptcy case (the “Bankruptcy Case”), pending under chapter 11 of
4 title 11 of the United States Code (the “Bankruptcy Code”),¹ filed with the United States
5 Bankruptcy Court, Santa Ana Division, located at 411 West Fourth Street, Santa Ana, California
6 92701, the Honorable Scott C. Clarkson, United States Bankruptcy Judge, presiding, this *Notice*
7 *of Motion and Motion to File Exhibit “1” of the Declaration of Christopher Ghio in Support of*
8 *Motion for Entry of Order Enforcing the Agreement of Purchase and Sale and Joint Escrow*
9 *Instruction, and Compelling Morning Law Group, P.C. to Make Payment Thereunder and Related*
10 *Relief Under Seal* (the “Motion”).² The Motion is made pursuant to 11 U.S.C. section 107, Federal
11 Rules of Bankruptcy Procedure Rule 9018(1), and L.B.R. 5003(c)(1). Specifically, the Trustee
12 seeks an order providing that:

14 1. Trustee is authorized to file Exhibit “1” to the *Declaration of Christopher Ghio in*
15 *Support of Motion for Entry of Order Enforcing the Agreement of Purchase and Sale and*
16 *Joint Escrow Instruction, and Compelling Morning Law Group, P.C. to Make Payment*
17 *Thereunder and Related Relief* under seal.

18 2. Exhibit “1” to the *Declaration of Christopher Ghio in Support of Motion for Entry of*
19 *Order Enforcing the Agreement of Purchase and Sale and Joint Escrow Instruction, and*

21 ¹ Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy
22 Code.

23 ² Exhibit 1 is a transmittal email and the tab titled “Summary” from the Excel document attached
24 to the email and titled “PEO-CONFIDENTIAL_Estate Share Calculation thru Q4 2024.xlsx.” The
25 Summary tab of the document contains the calculation relevant to the Motion; however, the Trustee
26 seeks filing of the entire document under seal in the event a party in interest or the Court would
27 like to review the entire document because it contains consumer personally identifiable
28 information and potentially commercially sensitive information. Moreover, the entire Excel
document would exceed 10,000 pages if converted into a PDF, whereas the “Summary” tab with
the relevant calculation is just a single PDF page.

1 *Compelling Morning Law Group, P.C. to Make Payment Thereunder and Related Relief*
2 will remain under seal by the Court absent further order from the Court, and will only be
3 available to the Court, the United States Trustee, the Trustee, and any auditor serving under
4 section 586(f) of title 28, as set forth in 11 U.S.C. section 107(c)(3), and counsel to
5 Morning Law Group, P.C.

6 **PLEASE TAKE FURTHER NOTICE that pursuant to L.B.R. 9013-1(p) the Court**
7 **may grant this Motion without a hearing.**

8
9 DATED this 2nd day of April 2025.

10 **FOX ROTHSCHILD LLP**

11 By: /s/ Nicholas A. Koffroth

12 Keith C. Owens (Bar No. 184841)
13 Nicholas A. Koffroth (Bar No. 287854)
14 Constellation Place
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16 Los Angeles, California 90067

17 *Counsel for Richard A. Marshack, Liquidation*
18 *Trustee of the LPG Liquidation Trust*
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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

Richard A. Marshack, Liquidating Trustee (the “Trustee”) of the LPG Liquidating Trust (the “Trust”), as representative of the successor-in-interest to the bankruptcy estate of the Litigation Practice Group, P.C. (the “Debtor”) in the above-referenced bankruptcy case (the “Bankruptcy Case”), pending under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”),³ filed this motion (the “Motion”) for entry of an order authorizing the Trustee to file Exhibit “1” of the *Declaration of Christopher Ghio in Support of Motion for Entry of Order Enforcing the Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling Morning Law Group, P.C. to Make Payment Thereunder and Related Relief* (the “Declaration”) under seal.⁴

On September 9, 2024, the Court entered an order [Docket No. 1646] (the “Confirmation Order”) confirming the *Modified First Amended Joint Chapter 11 Plan of Liquidation (Dated June 14, 2024)* [Docket No. 1344] (the “Plan”) jointly proposed by the Official Committee of Unsecured Creditors and the Trustee.

On April 2, 2025, the Trustee filed a *Motion for Entry of Order Enforcing the Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling Morning Law Group, P.C. to Make Payment Thereunder and Related Relief* (the “PSA Enforcement Motion”), wherein the

³ Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy Code.

⁴ Exhibit 1 is a transmittal email and the tab titled “Summary” from the Excel document attached to the email and titled “PEO-CONFIDENTIAL_Estate Share Calculation thru Q4 2024.xlsx.” The Summary tab of the document contains the calculation relevant to the Motion; however, the Trustee seeks filing of the entire document under seal in the event a party in interest or the Court would like to review the entire document because it contains consumer personally identifiable information and potentially commercially sensitive information. The Trustee has also limited Exhibit “1” to the “Summary” tab with the relevant calculation (a single PDF page) because the entire Excel document would exceed 10,000 pages if converted into a PDF.

Trustee seeks entry of an order enforcing the *Agreement of Purchase and Sale and Joint Escrow Instructions* [Docket No. 416] (the “PSA”), and compelling Morning Law Group, P.C (“MLG” or “Buyer”) to immediately pay to the Trust the undisputed purchase price payment attributable to the Fourth Quarter of 2024, in the amount of \$953,247.59 (the “Undisputed Payment”) and prevailing party attorney’s fees and costs (the “Prevailing Party Fees”), pursuant to the PSA.

II.

11 U.S.C. § 107 AND LBR 5003(C)(1) AUTHORIZE SEALING EXHIBIT “1”

Local Bankruptcy Rules state the following related to applications for filing documents under seal:

5003(c)(1). Filing Under Seal. Subject to 11 U.S.C. § 107, a document may not be filed under seal without a prior written order of the court. If a filing under seal is requested, a written motion requesting such relief and a proposed order must be presented to the judge in the manner set forth in The Central Guide.

The Central Guide states the following related to application for filing documents under seal:

5003-2(c): Confidential Documents: Court Permission to File Under Seal. No documents may be presented to the Court for filing under seal unless and until the court has granted a motion authorizing the filing of such documents under seal. All motions for authority to file documents under seal must be filed electronically, if the filer is an attorney.

1. The motion should include as exhibits, or in a separate appendix also filed electronically, the documents that the movant seeks to file under seal with the confidential portions redacted; provided, however, that, if the documents are voluminous, the motion may be accompanied by a declaration under penalty of perjury to this effect and a schedule of the documents that movant seeks to file under seal.

2. The motion must describe the nature of the information that the party asserts is confidential (without disclosing the confidential information) and explain why the information should not be publicly disclosed.

1 3. If and when the court grants the motion for authority to
2 file documents under seal, unredacted versions of the documents,
3 together with an entered copy of the order authorizing the sealed
4 filing, should be presented for filing under seal in the manner
5 directed by the court in its order authorizing the filing under seal.

6 11 U.S.C. Section 107 states:

7 (b) On request of a party in interest, the bankruptcy court shall, and
8 on the bankruptcy court's own motion, the bankruptcy court may—

9 (1) protect an entity with respect to a trade secret or
10 confidential research, development, or commercial information; or

11 (c)

12 (1) The bankruptcy court, for cause, may protect an
13 individual, with respect to the following types of information to the
14 extent the court finds that disclosure of such information would
15 create an undue risk of identity theft or other unlawful injury to the
16 individual or the individual's property:

17 (A) Any means of identification (as defined in
18 section 1028(d) of title 18) contained in a paper filed, or to
19 be filed, in a case under this title.

20 18 U.S.C. Section 1028(d) states:

21 (7) The term "means of identification" means any name or
22 number that may be used, alone or in conjunction with any other
23 information, to identify a specific individual, including any –

24 (A) name, social security number, date of birth ...

25 Federal Rules of Bankruptcy Procedure Rule 9018 states:

26 On motion or on its own initiative, with or without notice, the court
27 may make any order which justice requires (1) to protect the estate
28 or any entity in respect of a trade secret or other confidential
research, development, or commercial information,

29 In this case, as explained in detail in the PSA Enforcement Motion, MLG was selected as
30 the successful bidder following a bidding process for the sale of substantially all of the Debtor's
31 assets, which resulted in MLG and the Trustee entering into the PSA. Among other things, the

1 purchase price set forth in the PSA was calculated as: (i) a deposit in the amount of \$5.5 million;
2 and (ii) a post-closing “earn-out” payment calculated as (a) 50% of all amounts collected by MLG
3 on “Active Executory Contracts,” and (b) 40% of all amounts collected by MLG on “Inactive
4 Executory Contracts.” *See* PSA at ¶ 2(a) and (b). The earn-out payments are to be “paid into the
5 Escrow Holder’s Account within 15 days of the end of each fiscal quarter (March 31, June 30,
6 September 30, and December 31).” *Id.* at ¶ 2(b). On July 22, 2023, the Court entered a
7 memorandum decision [Docket No. 320] approving the sale transaction to MLG. On August 2,
8 2023, the Court entered an order (the “Sale Order”) [Docket No. 352] granting the Sale Motion.
9 The Sale Transaction closed on August 4, 2023.

10 Nearly a year-and-a-half after the sale hearing, the Estate (and now its successor, the Trust)
11 received approximately \$1.5 million on account of the Earn-Out. Some of the delay is owing to a
12 pending dispute between MLG and the Trust over the interpretation of the PSA’s Earn-Out
13 calculation (the “Earn-Out Dispute”) and MLG’s reported retention of far fewer Debtor clients
14 than anticipated. *See* Docket No. 1334 (Stipulation at 2) (outlining scope of Earn-Out Dispute);
15 Docket No. 1345 (Disclosure Stmt. at 20). However, on January 15, 2025, MLG provided its
16 quarterly calculation of the Earn-Out due to the Trust. Under MLG’s view of the Earn-Out
17 calculation, MLG agreed that it owed the Trust \$953,247.59 for the Fourth Quarter of 2024.

18 To that end, the Trustee intends on submitting the Q4 2024 quarterly calculations of the
19 Earn-Out as provided by MLG in support of the PSA Enforcement Motion. The Q4 2024 quarterly
20 calculations of the Earn-Out were shared by MLG and marked as “Professionals’ Eyes Only /
21 Highly Confidential.” The quarterly calculations contain information that MLG may contend is
22 highly confidential commercially sensitive information, including, but not limited to MLG’s
23 financial information and nonaggregated information concerning MLG revenue, which would be
24 the proper subject for a motion to seal pursuant to 11 U.S.C. § 107(b)(1).⁵ Additionally, the

25
26 ⁵ Pursuant to the PSA, the Trustee was provided “Audit Rights,” which are defined as “[n]othing
27 herein shall prevent the Seller or any other estate representative including the Committee or
28

1 quarterly calculations in other portions of the Excel document (under tabs not attached to the Ghio
2 Declaration) contain personally identifiable information of consumer clients. Here, the names of
3 the consumer clients are a “means of identification” within the meaning of 18 U.S.C. §
4 1028(d)(7)(A), and it is a proper subject for a motion to seal pursuant to 11 U.S.C. § 107(c)(1)(A).

5 Moreover, the *Protective Order for Information Provided by Morning Law Group P.C.,*
6 *Pursuant to Audit Rights Granted Under Sale Order* (the “Protective Order”) [Docket No. 599]
7 restricts the Trustee from disclosing client information.

8 It will be virtually impossible to redact Exhibit “1” because it is a list of financial
9 information, including but not limited to nonaggregated information concerning MLG’s revenue.
10 In other portions of the Excel document, under tabs not attached to the Ghio Declaration, the Excel
11 contains lengthy lists of names of consumer clients. Moreover, if redacted, the redacted version is
12 unlikely to be of any assistance to this Court given that the calculation is entirely comprised of
13 (potentially) sensitive commercial information. Accordingly, the Declaration of Nicholas A.
14 Koffroth is being submitted concurrently herewith pursuant to Section 5003-2(c) of The Central
15 Guide.

16 III.

17 **THE MOTION TO SEAL EXHIBIT “1” SHOULD BE GRANTED**

18 WHEREFORE, the Trustee seeks an order from the Court to permit the Trustee to file the
19 Exhibit “1” to the Declaration of Christopher Ghio in Support of Motion for Entry of Order
20 Enforcing the Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling
21

22 _____
23 Monitor (defined below) from retaining any and all right to make reasonable demands for
24 accountings and audits with respect to the Assumed Contracts or related inquiries and Buyer
25 therefore agrees to comply with requests of Seller and the Committee related to the same (“Audit
26 Rights”).” PSA at ¶ 2 (b). Nothing contained in this Motion or the PSA Enforcement Motion is
27 an admission that the commercially sensitive information that the Trustee seeks to file under seal
28 is in fact commercially sensitive information, but is done in an abundance of caution, and in
accordance with the Protective Order, which prevents the Trustee from disclosing client
information.

Morning Law Group, P.C. to Make Payment Thereunder and Related Relief under seal. The Declaration itself will be filed regularly on the Docket.

DATED: April 2, 2025

FOX ROTHSCHILD LLP

By: /s/ Nicholas A. Koffroth
Keith C. Owens
Nicholas A. Koffroth
*Counsel for Richard A. Marshack, Liquidation
Trustee of the LPG Liquidation Trust*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: NOTICE OF MOTION AND MOTION TO FILE EXHIBIT "1" TO THE DECLARATION OF CHRISTOPHER GHIO IN SUPPORT MOTION FOR ENTRY OF ORDER ENFORCING AGREEMENT OF PURCHASE AND SALE AND JOINT ESCROW INSTRUCTION, AND COMPELLING MORNING LAW GROUP, P.C. TO MAKE PAYMENT THEREUNDER AND RELATED RELIEF UNDER SEAL RELATED RELIEF UNDER SEAL on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 4/02/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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2. SERVED BY UNITED STATES MAIL: On 4/02/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

See attached for additional parties

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 1/08/2025, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/02/2025

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

Additional Parties Served by U.S. Mail

Creditors who have the 20 largest unsecured claims

Debt Validation Fund II, LLC
5075 Lower Valley Road,
Atglen, PA 19310

MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
598 Cottonwood Dr.,
Glenview, IL 60026

Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
Sunrise, FL 33323

Marich Bein LLC
99 Wall Street, Ste 2669
New York, NY 10005

Business Centers of America
1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

JP Morgan Chase
3 Park Plaza, Ste 900
Irvine, CA 92614

CA Franchise Tax Board
PO Box 942857
Sacramento, CA 94257-0511

Outsource Accelerator Ltd
City Marque Limited
Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

Collaboration Advisors
400 Dorla Court
Zephyr Cove, NV 89448

Anthem Blue Cross

1 PO Box 511300
2 Los Angeles, CA 90051-7855

3 Azevedo Solutions Groups, Inc.
4 420 Adobe Canyon Rd.
5 Kenwood, CA 95452

6 Debt Pay Pro
7 1900 E Golf Road, Suite 550
8 Schaumburg, IL 60173

9 Sharp Business Systems
10 8670 Argent St
11 Santee, CA 92071

12 Tustin Executive Center
13 1630 S Sunkist Steet, Ste A
14 Anaheim, CA 92806

15 Exela Enterprise Solutions
16 2701 E. Grauwylar Road
17 Irving, TX 75061

18 Netsuite-Oracle
19 2300 Oracle Way
20 Austin, TX 78741

21 Credit Reporting Service Inc
22 548 Market St, Suite 72907
23 San Francisco, CA 94104-5401

24 Document Fulfillment Services
25 2930 Ramona Ave #100
26 Sacramento, CA 95826

27 Executive Center LLC
28 5960 South Jones Blvd
Las Vegas, NV 89118

LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

Secured Creditors

Diverse Capital LLC
323 Sunny Isles Blvd., Suite 503
Sunny Isles, FL 33154

City Capital NY
1135 Kane Concourse
Bay Harbour Islands, FL 33154